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6 Attorneys for Plaintiff
- SYNOPSYS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NOTICE OF MOTION AND RELIEF REQUESTED

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 6, 2004, at 9:30 A.M., or as soon thereafter as counsel may be heard in Courtroom 11 of the above-entitled Court, plaintiff Synopsys, Inc. (“Synopsys”) will seek an order from this Court authorizing them to take the deposition of Dr. Donald Thomas. Synopsys’ motion is based on the following memorandum of points and authorities, all pleadings and papers in the Court’s file, the arguments of counsel, and any additional evidence this Court may consider at the time of the hearing.

MEMORANDUM OF POINTS AND AUTHORITIES

Synopsys joins in and adopts the arguments made in the Motion Requesting Court Order Lifting Restrictions Imposed By Delaware Court on Deposition of Dr. Donald Thomas, filed December 2, 2003 in *Ricoh Co., Ltd. v. Aeroflex Inc., et al.*, Case No. CV 03-04669 MJJ.

Dated: December 2, 2003

Respectfully submitted,

HOWREY SIMON ARNOLD & WHITE, LLP

By: /s/
Teresa M. Corbin
Christopher Kelley
Thomas Mavrakakis
Erik K. Moller

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Attorneys for Plaintiff
SYNOPSYS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Synopsys, Inc.,) Case No. CV 03-02289 MJJ
Plaintiff,)
vs.)
Ricoh Company, Ltd.,) [PROPOSED] ORDER GRANTING
Defendant.) DEFENDANTS' MOTION REQUESTING
) COURT ORDER LIFTING RESTRICTIONS
) IMPOSED BY DELAWARE COURT ON
) DEPOSITION OF DR. DONALD THOMAS.
)
) Date: January 6, 2004
) Time: 9:30 a.m.
) Ctrm: 11, 19th Floor
) Judge: Hon. Martin J. Jenkins
)
)

1 This matter came before the Court on January 6, 2004 on motion by plaintiff Synopsys, Inc.
2 seeking an order from this Court authorizing it to take the deposition of Dr. Donald Thomas.

3 After consideration of the papers filed in support of the motion, any papers filed in opposition,
4 and any oral argument of counsel:

5
6 IT IS ORDERED, ADJUDGED AND DECREED that:

7 1. Synopsys may take the deposition of Dr. Donald Thomas.

8
9 Dated: _____, 2003

10 _____
11 The Honorable Martin J. Jenkins
12 United States District Court Judge